Environmental
Resources
Management

April 16, 2007

Ms. Stephanie Carr
RCRA Facility Manager
United States Environmental Protection Agency
Region 1
1 Congress Street
Suite 1100
Boston, Massachusetts 02114-2023

ERM

RE: Edelman Property, 80 Pickett District Road, New Milford, CT
Response to EPA Correspondence dated March 22, 2007
ERM Project No. 0059195

Dear Ms. Carr:

ERM-Northeast, Inc. (ERM) is pleased to respond to your correspondence to Joshua A. Creem, Corillian Corporation, dated March 22, 2007, which presented your comments on the January 2007 "Annual Report on the Status of Remediation" for the Edelman facility located at 80 Pickett District Road in New Milford, Connecticut. For ease of review, ERM addresses each comment as enumerated in your correspondence.

1. **Table 1 Issues.**

EPA notes that recent laboratory data is missing from the data summaries provided on Table 1. ERM has investigated, and found that an older version of "Table 1" was inadvertently included with the report (although, as EPA notes, the actual laboratory data sheets for the data from the April, July, and October 2006 sampling events were included in Appendix C). ERM apologizes for this oversight, and has enclosed herewith the version of Table 1 originally intended to be included with our January 2007 transmittal.

Going forward, all data will beincluded in an updated table.

2. **Figure 2 Issues**

EPA correctly observed that the position of monitoring well *ERM-10* is not precisely located on the existing drawings. ERM is aware of this situation and we have been awaiting the results of an A2 survey to revise the figures for subsequent annual reports.

The A2 survey is being completed as part of the preparation of an Environmental Land Use Restriction (ELUR) as part of the remediation strategy pursuant to the Connecticut Transfer Act and Remediation Standard Regulations. The results of the survey will include a revised "base map" of the Site, with all structures and features (including monitoring well locations) located to the A2 standard of accuracy. This is likely to result in very minor modifications of the representation of the well locations including well ERM-10.

The revised base map is anticipated to be completed before the end of April, 2007. All subsequent figures will be based on this revised map.

If you have any questions or need additional information, please feel free to call us at (860) 466-8500.

Regards,

Robert J. Drake, PE, Ph.D., LEP.
Senior Project Manager

Kevin P. King, LEP
Principal in Charge

cc: Joshua A. Creem, Esq., Corillian
Andrew N. Davis, Esq., Leboeuf, Lamb, Greene & MacRae
Anthony Corletto, Esq.
Gennady Shteynberg, CT DEP
Robert Good, LEP, LBG

Encl:

Table 1: AOC-7 Site Groundwater Overburden Groundwater
Intelidata
New Milford, CT

ERM ID #	SWPC	New Res. VC	New I/C VC	ERM-6					ERM-11						ERM-13					ERM-14			
Date Sampled				5/24/2001	2/26/2004	4/7/2006	7/21/2006	10/6/2006	5/24/2001	3/26/2003	2/25/2004	4/7/2006	7/21/2006	10/6/2006	8/21/2001	2/24/2004	4/7/2006	7/21/2006	10/6/2006	2/26/2004	4/7/2006	7/21/2006	10/6/2006
Lab ID #				AC49440	SA08839-01	SA43140-03	SA48484-01	SA52387-01	AC49445	AD75101	SA08839-10	SA43140-01	SA48484-02	SA52387-02	AC66178	SA08749-03	SA43140-02	SA48484-03	SA52387-03	SA08893-04	SA43140-04	SA48484-04	SA52387-04
Time Collected				11:35	9:31	12:00	12:45	13:30	12:05	10:49	15:10	14:45	13:25	15:00	13:50	11:10	12:45	12:00	12:30	10:35	11:15	11:20	14:15
VOCs (ug/L)																							
Chloroform				ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	111
1,4 Dioxane	NE	NE	NE	NT	<10	ND	ND	ND	NT	NT	<200	ND	ND	ND	NT	<250	ND	ND	ND	<10	ND	ND	ND
1,1-Dichloroethane	NE	3,000	41,000	17	21	9.2	ND	12.0	23	41	ND	20.5	18.4	5.0	40	50	4.2	5.2	ND	136	31.2	86.2	89
1,2-Dichloroethane	2,970	6.5	68	ND	<1	ND	ND	ND	ND	1.0	**<20**	ND	ND	ND	ND	**<25**	ND	ND	ND	<1	ND	ND	ND
1,1-Dichloroethene	96	190	920	15	29	12.3	15.0	50.8	72	**130**	76.2	58.3	32.5	23.4	37	46.5	4.6	19.4	19.2	381	73.9	198	214
cis-1,2-Dichloroethene	NE	830	11,000	27	54.5	15.6	ND	12.0	24	46	21.2	35.1	8.2	ND	27	91	12.4	12.8	15.9	157	33.5	85	76
trans-1,2-Dichloroethene	NE	1,000	13,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.36	ND	ND	ND
Methyl tert-butyl ether	NE	*21,000*	*50,000*	ND	2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Tertachloroethene	88	340	810	7.8	11.8	24.7	ND	ND	7.7	12	ND	52.6	6.4	ND	11	ND	5.7	5.6	ND	32.4	5.6	ND	ND
Toleune	4,000,000	7,100	41,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,1-Trichloroethane	62,000	6,500	16,000	2,400	2,860	1,400	608	750.0	2,000	3,200	2,300	3,230	313	220.0	3600	4,860	697	1,500	836	**8,840**	3,320	**7,480**	**5,470**
1,1,2-Trichloroethane	1260	220	2,900	ND	1.1	ND	ND	ND	1.1	1.6	ND	1.2	ND	ND	1.2	ND	ND	ND	ND	3.95	ND	ND	ND
Trichloroethene	2340	27	67	**43**	**99.2**	**39.2**	**32.7**	**79.0**	**95**	**150**	**154**	**118**	**71**	**38.2**	**110**	**139**	**28.4**	**77**	**54.1**	**294**	**49.8**	**151**	**172**
1,2,4 Trimethylbenzene	NE	360	4,800	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,3,5 Trimethylbenzene	NE	280	3,900	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Total Metals (mg/L)																							
Barium	NE	NA	NA	0.0303	NT	NT	NT	NT	0.0575	NT	NT	NT	NT	NT	0.0407	NT	NT	NT	NT	NT	NT	NT	NT
Chromium	NE	NA	NA	ND	ND	NT	NT	NT	0.00568	NT	ND	NT	NT	NT	ND	ND	NT	NT	NT	ND	NT	NT	NT
Copper	NE	NA	NA	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT
Iron	NE	NA	NA	NT	ND	NT	NT	NT	NT	NT	ND	NT	NT	NT	NT	ND	NT	NT	NT	0.817	NT	NT	NT
Lead	0.013	NA	NA	ND	NT	NT	NT	NT	0.00423	NT	NT	NT	NT	NT	ND	ND	NT	NT	NT	NT	NT	NT	NT
Manganese	NE	NA	NA	NT	0.0063	NT	NT	NT	NT	NT	0.0038	NT	NT	NT	NT	0.0142	NT	NT	NT	0.04	NT	NT	NT
Potassium	NE	NA	NA	NT	4.86	NT	NT	NT	NT	4.46	4.04	NT	NT	NT	NT	3.42	NT	NT	NT	13.3	NT	NT	NT
Zinc	0.123	NA	NA	ND	NT	NT	NT	NT	ND	ND	NT	NT	NT	NT	ND	NT	NT	NT	NT	NT	NT	NT	NT
CT ETPH (mg/L)	NE	NA	NA	NT	ND	NT	NT	NT	NT	ND	ND	NT	NT	NT	NT	ND	NT	NT	NT	ND	NT	NT	NT
PCBs (ug/L)	0.5	NA	NA	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	ND	NT	NT	NT	NT	NT	NT	NT
Cyanide (mg/L)	0.052	NA	NA	NT	ND	NT	NT	NT	NT	NT	ND	NT	NT	NT	NT	ND	NT	NT	NT	ND	NT	NT	NT

ND - Concentrations sre below laboratory detection limits
NA - Not Applicable
NT - Not Tested
NE - Criteria Not Established